

Case Nos. 15-1445, 15-1501

**IN THE UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

**AMERICAN BAPTIST HOMES OF THE WEST
d/b/a PIEDMONT GARDENS,**

Petitioner/Cross-Respondent,

v.

NATIONAL LABOR RELATIONS BOARD,

Respondent/Cross-Petitioner,

and

**SERVICE EMPLOYEES INTERNATIONAL UNION,
UNITED HEALTHCARE WORKERS – WEST,**

Intervenor.

**UNOPPOSED MOTION FOR LEAVE TO
PARTICIPATE IN ORAL ARGUMENT**

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Healthcare Workers – West

Pursuant to Circuit Rule 34(c), Intervenor Service Employees International Union, United Healthcare Workers – West, moves for leave to participate in the oral argument in this case scheduled for February 2, 2017.

Service Employees International Union, United Healthcare Workers – West has filed a brief as intervenor. The National Labor Relations Board has agreed to cede five minutes of the NLRB's argument time to the intervenor. Counsel for the National Labor Relations Board does not oppose this motion.

Dated: January 26, 2017

Respectfully submitted,

/s/ David A. Rosenfeld

DAVID A. ROSENFELD

BRUCE HARLAND

Attorneys for Intervenor Service
Employees International Union,
United Healthcare Workers – West

CERTIFICATE OF COMPLIANCE

Pursuant to Federal Rule of Appellate Procedure 32(a)(7)(C),
Intervenor for Respondent/Cross-Petitioner certifies that its brief contains
76 words, proportionally spaced, 14-point type in a Century Schoolbook
font style, and the word processing system used was Microsoft Word 2010.

Dated: January 26, 2016

Respectfully submitted,

/s/ David A. Rosenfeld

DAVID A. ROSENFELD

BRUCE HARLAND

Attorneys for Intervenor Service
Employees International Union,
United Healthcare Workers – West

CERTIFICATE OF SERVICE

I am a citizen of the United States and an employee in the County of Alameda, State of California. I am over the age of eighteen years and not a party to the within action; my business address is 1001 Marina Village Parkway, Suite 200, Alameda, California 94501.

I hereby certify that on January 26, 2017, I electronically filed the foregoing with the United States Court of Appeals, District of Columbia Circuit, by using the Court's CM/ECF system.

I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the Notice of Electronic Filing by the Court's CM/ECF system.

I certify under penalty of perjury that the above is true and correct. Executed at Alameda, California, on January 26, 2017.

/s/ Karen Kempler
Karen Kempler